

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

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|--|---|----------------------|
| In Re: | * | CHAPTER 13 |
| Xavier Rahiem Ridgeway | * | CASE NO.20-61304-PMB |
| Debtor | * | |
| <hr/> | | |
| | * | |
| Peritus Portfolio Services, II LLC, as agent | * | |
| For Wollemi Acquisitions, | * | |
| Movant | * | |
| | * | |
| v. | * | |
| Xavier Rahiem Ridgeway | * | |
| Defendant | * | |
| And | * | |
| CHRISTOPHER T. MICALE | * | |
| Trustee | * | |
| | * | |

TO THE HONORABLE PAUL M. BLACK JUDGE:

Comes now counsel for the Debtor, and pleads as follows in response to the motion for relief from automatic stay filed by the Movant:

1. The Debtor is surrendering the 2016 Dodge Challenger and will file an amended plan to provide for surrender treatment to convert the claim to a dischargeable claim and to set a deadline for deficiency.

WHEREFORE, for the foregoing reasons, the Debtor respectfully requests that no Order adverse to her be entered.

Respectfully submitted,

XAVIER RAHIEM RIDGEWAY
By: /s/ Heather R. Parsons
Of Counsel

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Counsel for Debtors

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that the preceding debtor's response to motion for relief from automatic stay has been mailed via electronic mail to the following parties, unless they are served automatically by CM/ECF:

Sara A. John, Esq.
Counsel for the Movant

Christopher T. Micale, Trustee

1/17/23
Date

/s/ Heather R. Parsons
Counsel